

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PABLO ALBERTO VARELA, *et al.*,

Plaintiffs,

-against-

THE REPUBLIC OF ARGENTINA,

Defendant.

10 CV 5338 (TPG)

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT upon the annexed declaration of Plaintiff Pablo Alberto Varela (on behalf of himself and his co-plaintiff Lila Ines Burgueño), dated November 30, 2010 (the “Varela Dec.”); the declaration of Plaintiff Mirta Susana Dieguez (on behalf of herself and her co-plaintiffs Maria Evangelina Carballo and Leandro Daniel Pomilio), dated November 23, 2010 (the “Dieguez Dec.”); the declaration of Plaintiff Susana Aquerreta, dated November 25, 2010 (the “Aquerreta Dec.”); the declaration of Plaintiff Maria Elena Corral (on behalf of herself and her co-plaintiff Teresa Muñoz de Corral), dated November 25, 2010 (the “Corral Dec.”); the declaration of Plaintiff Norma Elsa Lavorato (on behalf of herself and her co-plaintiff Carmen Irma Lavorato), dated November 23, 2010 (the “Lavorato Dec.”); the declaration of Plaintiff Marta Azucena Vazquez (on behalf of herself and her co-plaintiffs Cesar Ruben Vazquez and Norma Haydee Gines), dated November 23, 2010 (the “Vazquez Dec.”); the declaration of Michael C. Spencer, dated August 3, 2011 (the “Spencer Dec.”); the Statement of Material Facts Pursuant to Local Rule 56.1; the accompanying Memorandum of Law; and the pleadings and all prior proceedings had herein, the undersigned will move this Court before the Honorable Thomas P. Griesa, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, New York, at such time as the Court directs, for an Order, pursuant to

Rule 56 of the Federal Rules of Civil Procedure, granting plaintiffs' motion for partial summary judgment as against defendant the Republic of Argentina, to strike defendant's discovery requests, and for such other relief as the Court deems just and proper.

Dated: New York, New York
August 3, 2011

MILBERG LLP

By: /s/ Michael C. Spencer
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